

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463.

RQ-2

MAY 2.8 1997

Alan Kramer, Treasurer Wisconsin Right to Life Political Action Committee 10625 W. North Avenue Milwaukee, WI 53226

Identification Number:

C00173278

Reference:

30 Day Post-General Report dated 12/2/96

Dear Mr. Kramer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule D of your report has failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and end of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report by providing the full name and address of each creditor and purpose of each debt. 11 CFR §104.11

- -Please amend Schedule D to revise your estimated debt, to the correct amount of debt owed to vendors, once a correct figure is known.
- -Please amend your Schedule E to include memo entries to show the allocation of independent expenditures when the communication concerns more than one federal candidate. (see enclosure)
- -2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds \$200 in a calendar year. In addition, 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of

unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. If CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

-Please provide the coverage dates of your report on Line 5 of the Summary Page.

-Be advised that you have used an incorrect committee identification number on the Summary Page of your report(s). Please file all future reports and correspondence using your correct identification number, C00173278, to avoid potential errors in entering your reports onto the public record.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our tell-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely.

Neil A. Evans Reports Analyst

Reports Analysis Division

Unitie other operating expenditures, taxes on an SSF's earnings are not payable by the connected arganization. AO 1977--19.

Independent Expenditures

Schedule E

Itemize any independent expenditure which, by liself or when added to other independent expenditures made to the same payes during the same calendar year, exceeds \$200. Independent expenditures are itemized on Schedule E. A subtotal for itemized independent expenditures is entered on Line (a).

Independent expenditures of \$200 or less do not need to be itemized, though the committee must report the subtolal of those expenditures on Line (b). 104.3(b)(3)(vii)(C) and 104.4(a).

Enter the total of Itemized and uniternized independent expenditures on Line (c) of Schedule E and on Line 24 of the Detailed Summary Page.

Certification

The freesurer must sign the statement on Schedule E which certifies, under penalty of perjury, that the expenditure meets the standards of "independence" (see Chapter 4 for more information). The form must be notarized. 104.8(b)(3)(vil)(B).

Last-Minute independent Expenditure Notices

The SSF must file a special notice when it makes an independent expenditure of more than \$1,000 (by itself or aggregated with other independent expenditures made to the same payee) after the 20th day but more than 24 hours before the day of an election. The notice must be received by the filing office within 24 hours after the expenditure is made (see "Federal Filing" on page 28). The notice must include all the information required on Schedule E. (This reporting requirement applies to a written contract of more than \$1,000. which the committee has not yet paid.) 104.4(b) and 104.5(g).

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Use memo entries to show the attocation of an independent expenditure when the communication concerns more than one federal candidate.

The SSF must report the last-minute expenditure a second time on Schedule E, titled with its next regular report. 104.4(a).

8. Reporting Loans

Continuously itemize all loans received and made by the SSF until they are repeid. All repayments made or received on a loan must also be itemized. 104.3(a)(4)(lv); 104.3(b)(3)(iii) and (vi); 104.3(d); 104.11. Procedures for reporting loans and loan repayments are explained below.

Reminder: Loans are considered contributions to the extent of the outstanding behance of the loan. 100.7(a)(1)(i). Loans from banks, however, are not considered contributions if made in the ordinary course of business. Endorsements and guarantees of bank loans, however, do count as contributions. 100.7(a)(1)(i) and (b)(11).